

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:**

**KENNETH RICHARD KIBODEAUX  
DEBTOR(S)**

§  
§  
§  
§

**CASE NO. 18-36197  
CHAPTER 13**

**OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Comes now Wells Fargo Bank, N.A. (hereinafter "WF"), a secured creditor in the above-entitled and numbered case, filing this Objection to Confirmation of Chapter 13 Plan, and in support hereof represents:

1. The above-styled Debtor(s) filed a voluntary petition under Chapter 13 of Title 11, United States Bankruptcy Code, on November 5, 2018.
2. Debtor(s) is indebted to WF pursuant to a promissory note secured by a recorded instrument granting a security interest in the real property with the address of 3906 Leanatt Way Ct, Pearland, Texas 77584 (the "Property").
3. The Property is the Debtor(s)' principal residence.
4. The total debt due and owing to WF as of the date of filing was approximately \$146,041.80, with pre-petition arrearage of approximately \$21,836.92 (the "Claim").
5. Debtor(s) Chapter 13 Plan (the "Plan") as proposed provides only \$18,500.00 to satisfy the pre-petition arrearage portion of the Claim.
6. WF objects to confirmation of the Plan because:
  - a. it does not comply with Section 1322(b)(2) because it understates the amount of the Claim, including, but not limited to pre-petition arrears and the total debt due and owing as of the date of filing.

WHEREFORE, PREMISES CONSIDERED, WF prays that this Court deny confirmation of the Plan, and grant it such other and further relief at law and in equity as is just.

Respectfully submitted,  
Bonial & Associates, P.C.

/s/ Chandra D. Pryor

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Attorney for Wells Fargo Bank, N.A.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served upon the following parties in interest either via pre-paid regular U.S. Mail or via electronic notification on or before the 12th day of December 2018:

Debtor *Via U.S. Mail*  
Kenneth Richard Kibodeaux  
3906 Lennett Way Court  
Pearland, TX 77584-5962

Debtor's Attorney  
Susan Tran  
Corral Tran Singh LLP  
1010 Lamar St Ste 1160  
Houston, TX 77002-1349

Chapter 13 Trustee  
David G. Peake  
9660 Hillcroft, Suite 430  
Houston, Texas 77096-3856

US Trustee  
Office of the U.S. Trustee  
515 Rusk Ave., Ste. 3516  
Houston, Texas 77002

18-36197

/s/ Chandra D. Pryor  
Shelly K. Terrill  
Braden P. Barnes  
Chandra D. Pryor